REMARKS/ARGUMENTS

The Applicant thanks the Examiner for the Office Action, made final, dated November 3, 2005.

AMENDMENTS

Claim 1 has been amended to correct the reference integers (a) to (e).

Claim 1 has been further amended to specify an automatic association step in the computer system. Basis for this automatic association step can be found on page 25, lines 14-17 and corresponding Figure 25.

Figure 25 represents the netpage computer system, and it can be clearly seen that, within this computer system, an automatic association is made between a page ID 50 (*e.g.* a photograph identification code) and a page description 5 (*e.g.* a photograph) at each page instance 830. These associated elements are stored in the page server. Therefore, the specification as filed unambiguously provides basis for the present claims.

CLAIM REJECTIONS - 35 USC § 103

It appears from the Examiner's comments that the Applicant's arguments submitted with Amendment D have not been given full consideration. It was not clear to the Applicant whether the Examiner's objection was due to the fact that integers (a) to (e) were mislabeled or whether it was due to the fact that "automatic" association was not specified in claim 1. Regardless, claim 1 has now been remedied to address these alleged deficiencies.

The Examiner is now requested to reconsider the arguments submitted previously with Amendment D. For convenience, these arguments are reproduced below.
The Examiner asserts that Dymetman discloses limitations (b) through (e) in claim 5. The Applicant disagrees and, moreover, disagrees that Dymetman discloses all the steps specified in claim 1.

The Examiner identifies column 32, line 49 *et seq* of Dymetman in support of his assertion that Dymetman discloses "a computer system allocating and recording photo ID codes". This passage of Dymetman describes how a coded substrate supplier can prevent counterfeit coded blank pages being produced by a counterfeiter predicting sequential numbering of blank pages. Dymetman's solution is to use a random number generator, a secret hash-encoding algorithm or a public-key-cryptography scheme. Thus, it is true that Dymetman's computer system allocates and records pages IDs for blank pages.

However, Dymetman fails to disclose the computer system associating each page ID with, for example, a digital photograph. In Dymetman's system, the coded substrate supplier supplies coded blanks to a publisher, who then uses these blanks for whatever purpose he chooses (*e.g.* music distribution via Digital Grammophon "DG"). Presumably, DG must perform some sort of association between the coded blanks he receives and the music he wishes to distribute. Without this association, Dymetman's system cannot work, but Dymetman fails to describe how this association is made. An obvious way of making the association is for DG to read the page ID on each printed page using an optical scanner, and then make an association between the coded music and the page ID after the coded music has been printed. The point is that in Dymetman's system, each page ID requires a separate manual association with the published material, because the coded blanks are supplied separately. By contrast, in the present invention the computer system automatically associates a photo ID with each

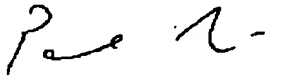
digital photograph, obviating any need for a manual association step. Hence, the present invention is clearly distinguished from Dymetman.

The present invention provides unique advantages over the system described in Dymetman. Dymetman fails to provide a system whereby interactive digital photographs can be printed on demand. Irrespective of whether or not one skilled in the art could print coded data and photographs simultaneously, Dymetman's system still does not allow on-demand printing of interactive photographs, because Dymetman has to somehow associate each coded blank with each photograph being printed. This cannot be done automatically in Dymetman's computer system, because there is no way that Dymetman's computer system can "know" onto which coded blank a photograph is being printed. Dymetman always requires a separate association step, meaning that a user cannot take a photograph, print it out and then interact with it; the set-up of Dymetman's system does not provide users with such versatility.

Since Dymetman does not provide the same versatility as the present invention, nor describe a system that could possibly achieve such versatility, it is submitted that the present invention is not obvious in view of Dymetman, either alone or in combination with any other of the cited documents.

It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

Very respectfully,
Applicant:



PAUL LAPSTUN

Applicant:

KIA SILVERBROOK

C/o: Silverbrook Research Pty Ltd
393 Darling Street
Balmain NSW 2041, Australia
Email: kia.silverbrook@silverbrookresearch.com
Telephone: +612 9818 6633
Facsimile: +61 2 9555 7762